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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional)

END920000080US1 (13679)

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on March 23, 2006

Signature _____

Typed or printed name John S. Sensny

Application Number

09/616,809

Filed

July 14, 2000

First Named Inventor

James R. Wason

Art Unit

2178

Examiner

Joshua D. Campbell

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).

Note: No more than five (5) pages may be provided.

I am the

☐ applicant/inventor.☐ assignee of record of the entire interest.
See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.
(Form PTO/SB/96)☒ attorney or agent of record.Registration number 28,757☐ attorney or agent acting under 37 CFR 1.34.

Registration number if acting under 37 CFR 1.34 _____

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Telephone number

March 23, 2006

Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.

☒ *Total of 1 forms are submitted.

This collection of information is required by 35 U.S.C. 132. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11, 1.14 and 41.6. This collection is estimated to take 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: James R. Wason

Examiner: Joshua D. Campbell

Serial No: 09/616,809

Art Unit: 2178

Filed: July 14, 2000

Docket: END920000080US1 (13679)

For: TEXT FILE INTERFACE
SUPPORT IN AN OBJECT
ORIENTED APPLICATION

Dated: March 23, 2006

Confirmation No.: 6597

Mail Stop AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REASONS FOR PRE-APPEAL BRIEF REQUEST FOR REVIEW

Sir:

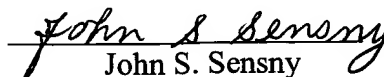
These Arguments are being submitted in support of Appellant's Pre-Appeal Brief Request for Review.

Claims 1-3 and 5-17 are pending in this application. In an Office Action dated December 23, 2005, the Examiner issued a final rejection of all of these claims under 35 U.S.C. 102 as being fully anticipated by U.S. Patent 6,317,871 (Andrews, et al.). Claims 1, 6 and 10 are independent claims. Claims 2, 3, 5, are dependent from Claim 1. Claims 7-9 and 15 are dependent from Claim 6; and Claims 11-13 and 16 are dependent from Claim 10.

CERTIFICATE OF MAILING UNDER 37 C.F.R. §1.8(a)

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Dated: March 23, 2006


John S. Sensny

I. CLEAR ERROR

The rejection of the claims is improper because Andrews, et al. clearly neither discloses nor suggests using a macro, which was invoked by one template, both (i) to map data from a text file to a computer application, and (ii) itself to invoke another template to further process the text file.

II. DISCUSSION

A. This Invention

This invention relates to a method and system for processing text files in computer application. A plurality of templates are formed having literal fragments of the text file, and one or more macro classes are provided to map data from the text file to the computer application. Pointers to the macro classes are embedded in the templates. In operation, a template is used as an overlay to parse the text file into segments having data, or as a prototype to generate a segment of an output file. During this operation, when a pointer to a macro is reached in the template, that pointer is used to invoke the macro class, and this macro class is used to map data from one of the segments of the text file to the computer application. The macro class then invokes another template to further process the text file.

B. Andrews, et al.

Andrews, et al. discloses a procedure for translating source code from one high-level computer language to another. In the disclosed procedure, fragment templates and partition templates are extracted from a source language text file, and a check is made for textual consistency of the target language code generated for each partition template. The described process then pieces together a target language code file from the partition templates, and

combines pieces of the target language code file that were generated in different translation sessions.

One specifically disclosed translation process is referred to as the Rosetta Translator. This Translator uses a syntax tree representation and a token mechanism. A source language syntax tree is used to represent the syntactic structure of a virtual source, and a source language fragment tree is employed to represent the virtual source production mechanisms that were used to create the virtual source.

C. Differences Between the Claims and Andrews, et al.

1. Andrews, et al. does not disclose using a macro, which was invoked by one template, both (i) to map data from a text file to a computer application, and (ii) itself to invoke another template to further process the text file.

In rejecting the claims, the Examiner (see Office Action of December 23, 2005, pages 2 and 3, paragraph 4) specifically cited the portion of Andrews, et al. from Column 7, Line 65 to Column 9, Line 50. This portion of Andrews, et al. discusses how the partition templates are used and how the Rosetta Translator builds a pTAL fragment tree, translates the contents of a macro body, and pieces together instances of target language partition templates to form target language output files.

Applicant's Attorney has carefully reviewed Andrews, et al, particularly columns 7-9. In the process described in Andrews, et al, macros are translated, but these macros are not used to map the translation. Andrews, et al. includes several references to translating macros. For example, in Column 8, Lines 41-43, Andrews, et al. notes that "the text of macro actual parameter fragment templates is collapsed into the invoking partition just before the file is pieced together.

In Column 8, Lines 47-50 of Andrews, et al., it is explained that that the source generator “fits the text representing the body of the macro stuff into the macro definition.” Further, in Column 8, Lines 57-59 of Andrews, et al., it is explained that “Inconsistently translated code can appear in any partition, not just in macro bodies.” Also, in Column 9, Lines 17-19, Andrews, et al. refer to “exposing different code (which might contain macro definitions) and directives to the translator.” Nowhere in Andrews, et al, though, is there any reference to using the macro to map the translation.

Independent Claims 1, 6 and 10 of the present application describe how the macros are used in the instant invention. Each of these claims describes the features that a plurality of templates are formed, and that during processing of the text file by one of the templates, a pointer in that template is used to invoke the macro class. These claims also describe the features that this macro class maps data from the text file to the computer application, and then itself is used to invoke another one of the templates to further process the text file. The way in which the first template invokes a macro, which then invokes a second template, is not shown in Andrews, et al.

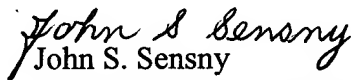
This feature of the invention is of considerable utility. This nested use of templates and macros allows a processing structure to be built up that mirrors the inherent structure of the text file. Since the behavior of the macro depends both on its internal logic and the template it is passed to invoke, it is possible to reuse the same macro to do different things by passing it a different template. The net effect is that the bulk of the logic needed to describe flow of control may be included in the template structure.

The other references of record have been reviewed, and they too, whether they are considered individually or in combination, do not disclose or suggest using a template/macro class combination in the manner described in Claims 1, 6 and 10.

III. CONCLUSION

Because of the above-discussed differences between Claims 1, 6 and 10 and Andrews, et al, it cannot be said that this reference anticipates any of these claims. Moreover, because of the differences between Claims 1, 6 and 10 and Andrews, et al, as well as the other references, and because of the advantages associated with those differences, Claims 1, 6 and 10 patentably distinguish over the prior art and are allowable. Claims 2, 3, 5, 14 and 17 are dependent from, and are allowable with, Claim 1. Claims 7-9 and 15 are dependent from Claim 6 and are allowable therewith, and Claims 11-13 and 16 are dependent from Claim 10 and are allowable therewith. Thus, the rejection of the claims over Andrews, et al. is not proper, and the panel is requested to ask the Examiner to withdraw this rejection. If the panel or the Examiner believes that a telephone conference with Applicant's Attorneys would be advantageous to the disposition of this case, the panel or the Examiner is asked to telephone the undersigned.

Respectfully submitted,


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